

ANDREWSEYBOLD

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July 25, 2011

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Room TWA325
Washington, DC 20554

RE: Notification of Ex Parte Communications
Docket No. 06-229

Dear Ms. Dortch:

Per the request of Jennifer Manner, Deputy Chief of the FCC's Public Safety and Homeland Security Bureau (PSHSB), I am submitting the following Email exchange between myself, as an interested third party, and Jennifer Manner.

The purpose of my email was to gain clarification from Ms. Manner on the issue of the number of Public Land Mobile Network Identifiers (PLMN IDs) that should be requested by Public Safety for the development of its Public Safety Nationwide Interoperability Network. This inquiry was based on work that has been done within the APCO Broadband Committee of which I am Vice-Chair and the Ex Parte filed by Chief Harlin McEwen dated July 19, 2011. I want to make it clear that I submitted the email request for a phone call or meeting to Jennifer Manner based upon numerous emails we have exchanged over the past two years and did so only as an interested party and not in my role as the Vice-Chair of the APCO Broadband Committee, and not in my role as a member of the Public Safety Advisory Council to ERIC, on which I represent the National Sheriffs' Association.

I was therefore confused by Jennifer Manner's request in her reply to me below that I file this email exchange as an Ex Parte communications for an ongoing pending issue. However, I am complying with her request to make this inquiry, and her answer, part of the public record.

I would like to stress that the results of the APCO Broadband committee, in the form of documents and recommendations, is then forwarded to the APCO Executive committee for its action and approval. My statement regarding the position of the APCO Broadband commission should not be construed as the official position of APCO International. My understanding is that APCO will weigh in on this matter after it has weighed the comments it receives from the Broadband Committee as well as other APCO committees.

I am, however, on record in my response to the FCC's Third Report and Order and Fourth Further Notice of Proposed Rulemaking published on January 25, 2011. I stated on page 5 of my response that one of the items that should be held in abeyance is the matter of the number of PLMN IDs that would be assigned to the Public Safety network and that I favor a single PLMN ID with secondary identifiers to identify a unit's relationship to a given area.¹

The issue of PLM IDs and the number assigned for Public Safety use is not a matter for the FCC to determine but rather a matter for the Public Safety Governance organization that is being proposed in Congress *AND* the ATIS IOC to determine based upon what is best for Public Safety and what fits into the overall PLMN ID plans for use within the United States and around the world.

Therefore, pursuant to Section 1.1206(b) of the commission's rules, I am filing this notice electronically in the above-reference dockets. Please contact me directly if you have any questions.

¹ <http://andrewseybold.com/wp-content/uploads/2011/04/FCCComments04-05-11PDF.pdf>

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Respectfully Submitted

A handwritten signature in black ink, appearing to read 'Andrew M. Seybold', with a stylized flourish at the end.

Andrew M. Seybold
CEO and Principal Consultant
Andrew Seybold, Inc.

RE: Request for a meeting

Jennifer Manner <Jennifer.Manner@fcc.gov>

• You forwarded this message on 7/25/2011 9:16 AM.

Sent: Mon 7/25/2011 5:17 AM

To: Andrew Seybold

Andy, thank you for your note. We are always interested during a comment period on obtaining more information on pending issues, such as PLMN IDs. Accordingly, I would request that you file your email as an ex parte and also consider filing the APCO Broadband Committee Report in the 700 MHz docket on this issue. We are happy to set up a meeting with you to hear your views on this issue which is currently the subject of an open rulemaking proceeding and which the Commission has not yet acted on. What time would be best for a call today or later this week?

Thank you,

Jennifer

From: Andrew Seybold [mailto:aseybold@andrewseybold.com]

Sent: Friday, July 22, 2011 3:02 PM

To: Jennifer Manner

Subject: Request for a meeting

Jennifer—Hope all is well with you.

I have just finished reading the ExParte filed by Harlin McEwen regarding his discussion with the PSHSB regarding the number of PLMIDs needed for the Public Safety System. I have to admit I am somewhat confused by what appears to be a difference of opinion regarding this matter.

I was hoping that you and I could schedule a phone call on Monday so that you can help me understand the FCC's Perspective on this issue, OR, perhaps better, since I will be in DC next week, perhaps we could set up a meeting on Friday the 29th? I will be tied up Wed and Thursday on the Hill but have Friday most any time available.

You may not be aware that the APCO Broadband Committee, of which I am Vice-Chair has looked at this issue in great detail and have concluded, and recommended, that the Public Safety Network make use of a single PLMID across the interoperable network and that each area can, if they so choose, make use of a sub-identifier to be able to identify the units assigned to them, and to provide those roaming into an area with the ability to request network connection upon their arrival in the area. A single PLMN ID greatly simplifies the network architecture and since Public Safety is not planning on cross or roaming billing between jurisdictions, there is really no need for more than a single PLMID but I would like to understand your rationale for seeking multiple PLMNIDs.

It is important that as we move forward with network design and back-end systems we are all on the same page regarding the operational considerations for this important network.

Thank you in advance,

Andy

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